

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

POOR QUALITY ORIGINAL

JASON TYRRELL ALVIN D FRAZIER SR AND  
JANE DOES AND JOHN DOES ET AL

Plaint:

Vs

NOAH NAGY FORMER JCF" WARDEN EMPLOYEES  
HEIDI WASHINGTON DIRECTOR OF MDOC JANE DOES  
AND JOHN DOES ET AL

Defendants /

Case: 2:24-cv-10250  
Assigned To : Cox, Sean F.  
Referral Judge: Morris, Patricia T.  
Assign. Date : 1/25/2024  
Description: PRIS JASON TYRELL  
ET AL V NOAH NAGY ET AL (MRS)

Preliminary Statement

This is a civil rights class action filed by Jason Tyrrell et al and all others similarly situated as ourselves State of Michigan prisoners for damages or possible consent degrees relief under Rule 23(a) et seq U S C § 1983 asking for GRANT of Class Certification Order and Court Notice be gave to all named Class Members for Constitutional decisions concerning allegations made for the unconstitutional reasons Hate Crimes Retaliation for exercising of First Amendment rights Racial Political Religious Discriminations Denial of Prisoners Medical care in violation of the State of Michigan First Amendment Eight Amendment Due Process Clause of the Fourteenth Amendment Constitutional rights in consort with mishandling of the State of Michigan consolidated provided appropriated funds for G Robert Cotton (JCF) Prison State of Michigan Department of Corrections Mental Health Case Management Programs Michigan Domestic Violence Program MIDVP Jackson College (JC) Prisoners rehabilitation educational programs and Attorney Generals (AG) agencies the Judicial Branches Ombudsman Legislative Branch and Capital outlay for the fisical years starting from 2018 through 2023 that s expected to end September 30 2023, and September 30 2024, to provide for certain conditions on the appropriations; to provide for the expenditure of the appropriations; and to repeal acts and parts of acts Some Plaintiffs alleges the suffering of mental and emotional harms in consort with physical harms and Cotton JCF" employed personnel negligence(s)

Jurisdiction

This State of Michigan Michigan Eastern District Court has the jurisdiction of Michigan State Counties under due process violations and the State of Michigan Legislature s enacted laws The Application requesting Civil Class Action Certification is being filed within time of the opinions and orders recent decided in this State thereof:

SEE ADDITIONAL PLAINTIFFS STATEMENTS/GROUNDS FOR CLASS ACTION:

IF THE STATE OF MICHIGAN DEPARTMENT OF CORRECTIONS IS NOT HELD ACCOUNTABLE  
THESE ACTIONS WILL CONTINUE

Local Attached as last pages

Plaintiffs Names: Attached Last pages

Numbers # Attached Last pages

## Grounds for Action case#

1. ADA: For anyone who has a active MENTAL HEALTH case manager, or is on psychological medications;
2. Intentional infliction of emotional pain and abuse of processes;
3. Government employees negligent of "Failing to use reasonable care" is claims, failure to do duty, breach, causation and damages;
4. Failure to protect prisoners from unreasonable risks;
5. Prisoners often bring negligence claims against prison doctors and nurses for medical malpractice. Covid-19, prisoners need of medical care withheld, medication withheld, FDA & CDC measures of social distances, living space of prisoners being housed within M.D.C.C.;
6. Exposures to COVID-19, Omicron, Monkey Pox, Tuberculosis, Hepatitis A/B/C, or any other diseases;
7. Officials violated State Statute by breaching a duty to let a prisoner make phone calls to attorneys based on the language from the code of Federal Regulations;
8. Intentional infliction of Emotional Distress is when officials purposeley do something outrageous that make you feel upset, like place Covid-19 measures signs up for us to follow for our protections/ but force us Not to Social Distance in chow halls, our living quarters, in day rooms, ect;
9. Convention against torture and other Cruel, Inhumane or degrading treatment or punishment;

- 10 For mental or emotional injury suffered while in custody without a prior showing of physical injury;
- 11 Equal protection of the laws to all citizens, a prison can not ban access to materials targeted to an African-American audience, if they do not ban similar materials popular among other people;
- 12 "Privileged Mail" "legal mail" or "special mail" of prisoners is protected by your constitutional right to access to the courts, as well as by the "attorney-client privilege", and are secret. Prison Officials can NOT read your legal mail and if they do or have done prior it is a violation;
- 13 MDAC is not valid under the constitution, a regulation or the officials action because it has a main effect of advancing setting back other religion, and its new regulations encourage excessive government entanglement with religion. The government is forcing prisoners to support or participate in other religions other than their own due to Covid-19.
- 14 Gender-based Classified prisoners treated different violations;
- 15 Eighth Amendment violations, forbids "Cruel and Unusual punishment" excessive force and guard brutality, as well as unsanitary, dangerous or overly restrictive conditions and medical care

16 Failure-to protect claim, Guards knew that there was a substantial risk you would be seriously harmed, and they failed to respond reasonably to protect you.

17 Deliberate indifference exists where J.C.F. officials have actually noticed that its actions or failures to act will result in a constitutional violation or when it is highly predictable that a constitutional violation will occur by grievance written or other ways.

THORBURGH V. ABBOTT,  
490 U.S. 401, 404 (1989).

18 Your right to decent conditions in prison was violated and continue to this day being violated due to inhuman living conditions in (J.C.F) prison, Cotton side + Temp side, Level Four, because prison officials violate the Eighth amendment when they act with deliberate indifference to a prison condition that exposed you to an unreasonable risk of serious harm or deprived one of your basic needs. Challenged unsafe living conditions due to Covid-19, FDA and CDC regulations required that were unable to be followed due to limited space in assigned prison units for my shelter, sanitation cleaning supplies, porters to clean, proper food calories, exercise, hygiene needs of others that exposed me and them to serious harm. How bad its been and how long its lasted.

19 I was injured physically and psychologically  
 20 Conditions of my confinement puts me in  
 a serious risk for an injury in the future,  
 like secondhand smoke

21 The officials who are being sued act with  
 "deleberate indifference" by knowing of  
 conditions and did not responde to it in reasonable  
 manners, which were so obvious that officials  
 knew about it and purposelly ignored it.

Write grievences + if you have we will  
 place them as exhibits with the others to this  
 complaint along with affidavits, or any prison  
 records that refers to problems

22 "JCF" Food Service Food prepared for prisoners is  
 being done in a way thats not clean and served  
 to yeild its prisoners their required nutricious  
 diets

23 Air Quality & Tempreture: Challenge because the  
 air quality poses serious danger to my health,  
 particularly in second hand smoke, extreem heat  
 or cold, improper beding, clothing not given  
 apppreprately for the tempreture when you just rode  
 in, or placed in other units due to close contect  
 with prisoners that tested positive for Covicl;

24 Sanatation supplies such as razors and cleaning  
 products not maid available to me # amount  
 of time

4

- 25 No proper trash procedures followed at all times in bathrooms/dayrooms / + unit cubicle areas
- 26 Rats infestations, and lack of indigent toothbrushes toothpaste, and soap kits upon new prisoners arrivals to Cotton (JCF) prison.
- 27 Lack of rehabilitative programs in general prisons of Cotton (JCF) prison level (1-2-4) for prisoners mentally ill and received rehabilitative services as part of my sentence
- 28 JCF denial of my adequate law library needs when it has decided to have educate law library to fulfill the needed requirements under bounds for its prisoners has ~~been~~ hurt my Non-Frivolous lawsuits and HABEAS petition
- 29 Restricting my access to the court after I have prior filed lawsuit due to a prior caused a actual injury + limitations were placed on me so restrictive that constitute a denial of my rights that caused courts to deny my claims.
- 30 I have a legal rite to get ~~the~~ legal help from other prisoners because the (JCF) prisoners because the (JCF) prison for over 80 days has denied to provide some reasonable alternative to assist its inmates in the preparation of petitions, ordered replies and briefs required from courts when we had no other ways



31. Any Retaliation: Denial of hygiene materials without cause while placed in segregation with no baths, showers, ect
32. Events of harassment that amounts to "Campaign of Harassments" for testifying prisoners
33. You filed a Grievance then were retaliated upon.
34. The prison official or officials did something to you for filing grievances, lawsuits, that was "Adverse action" was so bad that it stopped you from continuing with the lawsuit or grievance: and
35. There is a "Casual connection" that means the official or officials did what they did because of what you were doing. The official actions were directly related to your "Protected Conduct"
36. Lack of a fire suppressant system in the living quarters designated as "pole barns" or "Temp side" at Cuthin (JCF).

67

## Parties

37 The court has jurisdiction over all the plaintiffs' claims of violations done by Cotton "JCF" prison personnel for violating their Federal Constitutional rights under 42 U.S.C. §§ 1331(a) and 1343.

38 The court has supplemental jurisdiction over the plaintiffs' State of Michigan law tort claims under 28 U.S.C. § 1367; Michigan Advance Legislative Service > Michigan 102ND Legislature - 2023 Regular Session > Act No. 119 Public Acts of 2023 > House Bill 4437 Misappropriation of State Funds Notice.

39. The additional plaintiffs' signed signatures are attached at end of complaint with their Account Statements, personal written statements as offer of proofs. See (Attachment 1).

40 I, Alvin Frazier, Sr., states, the Cotton JCF prison Head Librarian Ms. Elum Hatutu is in violation of sharing prisoners' legal writers' clients' privileged information with the Attorney General's Office to help have prisoners' civil action cases filed be dismissed in courts in consort with other State of Michigan Officials by closing Law Library, not making copies timely, and causing Cotton "JCF" Prisoners' Legal Writers to ineffectively litigate or perfect their assigned prisoners' clients' legal papers submitted to courts.

41 I, Alvin Frazier, Sr., states, Michigan Department of Corrections - Correctional Facilities Administration within the Grand Plaza Building - Fourth Floor, Lansing, MI 48909, staff members are Defendants: Brendon Waddell, who is on a list with Norma Killough that is deemed UCC/ Restricted Publications State Wide to Prisoners List and is only used in consort with other State of Michigan Defendant Actors to have Prisoners' lawsuits thrown out by gaining prisoners' privileged legal information prior to their filings of papers copied/done by legal writers to mislead the Courts.

42 I, Alvin Frazier, Sr., states, the Legal Writer assigned to me, Prisoner Frazier, Sr., in 2016 through 2021 up until his being sentenced to life, prisoner gave exonerations who acted in consort with Cotton "JCF" staff and higher ups in Lansing, MI, Grandview Plaza Building - Fourth Floor, Michigan Government State employees whose directed from the Director of Michigan Department of Corrections, Heidi Washington, Offices of Adrian Dirschell, Jared Warner, Andy Phelps, Kristine VanHatten, A/Litigation Manager. Legal Writers are directed to contact Adrian Dirschell, LW - Law Firm: Terese Paletta as (contact persons), John Tellier (computer tech), Norma Lillough, LOM, Reference Library, Bridgid Murphy, Turner - Librarian in consort with Cotton "JCF" Prison Head Librarian Hatatu Elum, Unknown Vacant Librarian Technician, and Needononiss Woodward, Librarian Technicians to alike pull woools over prisoners' heads and eyes by using deceitful illegal tactics consisting of posing as their helping prisoners file meaningful legal papers over working assigned Prisoners' Legal Writers while having only one qualified prisoner employed Legal Writer who accept incentives to file meaningless legal papers in courts for prisoners as clients.

43 I, Alvin Frazier, Sr., states, Prior during 2017 through 2019 at this time Defendant Brandon Waddell, Assistant Attorney General, illegally was provided my confidential Psychological Mental Health Records without my



consent while my then assigned Cotton JCF" Prison Prisoners Legal Writer Terry Gilbert Pool was my legal writer and ordered by Cotton (JCF) staff Ms K Napier et al to contact Brandon Waddell Adrian Dirshell and Terese Paletta in consort with Jhon Tellier with my personal Litigation information also

44 I Plaintiff Alvin Frazier states Kimberly Napier Cotton JCF employed Litigation Administrator and Administrative Assistant for prior Warden Noah Nagy, Assistant (\*20 Forum Representative Attending) Forum Agenda Meetings With Housing Units Representatives) orders lower level officers to retaliate I been told everytime I become a Prison Housing Unit Block Representative don't try to change nothing which now has caused me a prolonged stay in prison recently from having bad Unit Block reports falsified Interestingly, I am running for block representative for TF- Unit now which is deemed a College unit appropriated funding is gave to house College Students in College like settings with adequate quit times to study in study rooms which while in College I was remove from do to racial discrimination bias retaliation done against me for engaging in filing Prison-Prisoners Grievances on inhumane treatments of prisoners in confinement inhumane living conditions in consort with lawsuits due to some Cotton JCF employees behaviors that warranted their un-becoming employees of the Department of Corrections but was never dealt with until other prisoners got assaulted by Correctional Officer William Hokanson - then recently retaliated by some of his racist peer Cotton JCF" Peer employed friends and some Cotton JCF Prisoners Alvin Frazier Sr and other prisoners who don't want to comment at this time due to fears of retaliation that may become and prolong their stays in prison

45 I Plaintiff Alvin D Frazier Sr has been recently racially discriminating against Sexually exposed to gay sexual conducts, advances and treated different then all white men which made up the entire course program members except for one native man who was also treated different and received the lowest grade scores beside all the white men who engaged in sexually made gay conversations and advances with "MDOC" hired Facilitator J Cooley while in "MIDVP" program being facilitated at Cotton (JCF) by employed facilitator Cooley himself" Facilitator J Cooley unethical Facilitating used methods negatively affected some Prisoners in MIDVP program participants who were recommended/required to complete program and myself I Alvin D Frazier Sr state as of now this year I am being denied my Jewish Diet Fast Meat Meals 9/18/2023, there was no Sugar PC gave for Breakfast Whipped Margarine or Orange Juice and when I mentioned there was no Orange Juice to Food Service JCF" employee Mr Rose Rose started displaying evil words and non-verbal temperaments; and Officials started having tantrums-higher ups avoid me after my voicing about when Facilitator J Cooley prior this year engaged in such gay sexual behaviors then singled me out by stating "I know if higher ups knew how I facilitated this program they ll get rid of me (J Cooley MIDVP Facilitator Statement made) Furthermore I am in fear because every since J Cooley violated the settlement agreement of confidentiality when he brought up ex prisoner Mr Glover Prison number 405155 settled lawsuit Honorable Judge Terrance Berg was said to had presided for retaliation purposes when he further after telling "MIDVP" participants that; it only been one prisoner who ever filed a lawsuit on me and won name Glover then ask me in support 'Frazier you remember Glover don't you? (J Cooley Facilitator of MIDVP Stated) I am in fear because

other officials been retaliating on me in ways that can prevent me and some other prisoners from accomplishing our goals of being released back into free society has us in great fears

46 I Prisoner Frazier prison number 379628 responded by stating yes I remember prisoner Glover that was prior here Mr Cooley and Mr Cooley further while laughing stated that was the only prisoner who ever successfully filed a lawsuit against me that settled/won (J Cooley Cotton JCF Assigned MIDVP Facilitator Statements Questions)

47 Defendant Noah Nagy was the Cotton JCF Head Warden for the control of all Security at Cotton JCF and was in control of all correctional staff at Cotton JCF. He is sued in his individual capacity cause he had knowledge at all times prior/recently that caused him to transferred to Parnell MDOC prison as Warden there to avoid legal actions filed against him at Cotton JCF prison

48 Tim Schubring Cotton JCF Business Manager is responsible for his failure to assure legislatures enactment of Cotton JCF prison Policy Directives and Operational Procedures were carried out by employees after he had gained prior knowledge of such problems involving everything mentioned in this class action by complaining plaintiffs

#### Facts

49 In 2022, all plaintiffs started being moved from around I, Prisoner Mr Frazier Sr at Cotton JCF and road out to various other MDOC prisons without explanations while some was in their Lansing recommended/required programs VFP, MIDVP, SOP et al Mr Schubring Cotton JCF prison Business Manager is solely responsible because he had prior knowledge and did nothing to correct problems to make sure Policy Directives and Operational Procedures was being followed by Cotton JCF employed staff

50 I Alvin D Frazier Sr states some Prisoners in consort with me has suffered physical injuries that left scares that will last a life time. Furthering the State of Michigan State Courts reasons for allowing Smith's Claims under grounds holding that monetary damages are available and appropriate in this case due to HATE CRIMES in consort with Hate Crimes due process violations that has been therefore unremarkable for all Prisoner Plaintiffs named in this class action asking for class certification. The State of Michigan Legislatures The Michigan Supreme Court and the Michigan Court of Appeals from my experience has left me and other Prisoners to question Judicial Officials by now asking what good is a State of Michigan constitutional right without any remedies when the essence of civil liberties certainly consists in the rights of every individual to claim the protections of the State of Michigan Constitutional laws that s daily intentionally violated/ignored by Department of Corrections whenever Prisoners receives any and all their injuries? The government of the United States State of Michigan Attorney General Office Department Officials in consort with the State of Michigan State Legislatures Keith Barber & Eric Mattson et al who emphatically terms a government of laws "i to prevent Prisoners civil complaints before complaints reach courts and often forget about men Prisoners constitutional rights violated At Cotton JCF prison it had certainly ceased to deliver this high Prisoners appellations and left the State of Michigan Constitutional laws in consort with the State Legislatures enacted laws furnishing no remedy for the violations of

Prisoners vested legal rights This complaint and request meets established methods of substantive due process analysis primary features (Due Process Clause) + (Procedure Due Process)

51 Plaintiffs Tyrrell and Frazier in an action brought under the provision of the Michigan Constitution which prohibits discrimination against any person on the basis of the person's religion race color or national origin Plaintiffs are held to the same burden as under the Federal Constitution's Fourteenth Amendment; that is they must demonstrate intentional or purposeful discrimination Harvill v State Plumbing & Heating (1996) 218 Mich App 302 553 NW2d 377 71 CCH Edp ¶44c26

52 Plaintiffs Tyrrell and Frazier state A legislative enactment challenged on an equal protection basis is accorded a presumption of Constitutionality; the court's inquiry is restricted to the issue of whether any state of facts either known or which reasonably could be assumed supports the enactment Beztak Co v Farmington Hills 136 Mich App 364 358 NW2d 25 1984 Mich App Lexis 2879 (Mich Ct App 1984)

53 Plaintiffs Tyrrell and Frazier state Discriminatory purpose or impact proof of discriminatory intent or purpose behind state action is required to show a violation of the equal protection clause of both the federal constitution; proof of discriminatory effect alone is insufficient to establish a violation of either provision Harville v State Plumbing & Heating (1996) 218 Mich App 302 553 NW2d 377 71 CCH EDP ¶44c26 Plaintiffs state they can in all respects of their allegations made in this class action

54 Plaintiffs Tyrrell and Frazier state legislature's amendment of the Elliot Larsen Civil Rights Act (ELORA) to effectively bar correctional facility prisoners from bringing ELORA suits was in direct violation of the State of Michigan Constitution which made clear that the mandatory legislation had to protect all persons; the amendment violated the constitutional mandate that the legislature craft laws for the protection of its individual citizens Doe v Dept of Corr 323 Mich App 475 917 NW2d 750 2016 Mich App Lexis 952 (Mich Ct App 2016)

55 Plaintiffs Tyrrell and Frazier state constitution of the State of Michigan 1963> Article I Declaration of Rights § 2 Equal protection; Discrimination The guaranty of equal protection of the law is not one of equality of operation or application to all citizens of the state or nation but rather one of equality of operation or applicability within the particular class affected which classification must be reasonable Tomlinson v Tomlinson 331 Mich 274 61 NW2d 102 1953 Mich Lexis 320 (Mich 1953)

56 Plaintiffs Tyrrell and Frazier state 28 § 1915(B)(4) In no event shall a prisoner be prohibited from bringing a civil action or appealing a civil or criminal judgment for the reason that the prisoner has no assets and no means by which to pay the initial partial filing fees

57 Plaintiffs Tyrrell and Frazier state 28 § 1915(B)(4)(d) The officers of the court shall issue and serve all process and perform all duties in such cases Witnesses shall be available as are provided for by law in other cases

58 I am currently housed at Cotton JCF" an MDOC § INHUMANE LIVING CONDITIONED CITE were synthetic drug smoke Hepatitis viruses scabies infected prisoners Pool Burns prisoner assigned living areas on Temp Side level one is under major construction I am requesting to be released from Cotton JCF prison to GPS Tether Home Confinement to complete the duration of my sentence based on urgent unhealthy inhumane living conditions MDOC Dangerously Short Staffed and new strain of Covid variant concerns

59 These class action grounds both Classification itself and test with which to scrutinize Classification must be weighted against rule of reason Renne v Waterford 73 Mich App 685 252 N W 2d 842, 1977 Mich App Lexis 1367 (Mich Ct App 1977) (3)(A) Regarded as having such an impairment For purpose of paragraph (1)(C): Section (3)(A) states An individual meets the requirement of being regarded as having such an impairment if the individual establishes that he or she has been subjected to an action prohibited under this act because of an actual or perceived physical or mental impairment whether or not the impairment limits or is perceived to limit a major life activity (3)(B) Paragraph (1)(C) shall apply to Mr Frazier Sr impairments because his impairments are not transitory and minor A transitory is an impairment with an actual or expected duration of 6 months or less Interestingly, Mr Frazier post traumatic stress and anxiety disorders is impairments with actual expected duration of his entire life time with keeping in mind certain situations that can cause his impairments to deteriorate his health 4 USC § 12102 part 1 of 2 Maber v Thelen 587 F 3d 122, § 12102 Definition of disability as used in this act: (1)Disability The term disability means with respect to Alvin Iwayne Frazier Sr under § 12102 (1)(C) his being a person regarded as having such an post traumatic stress and anxiety disorders (as described in paragraph (3))

(4) Rule of Construction regarding the definition of disability The definition of disability in paragraph (1) shall be construed in accordance with the following:

(A) in this act shall be construed in favor of broad coverage of individuals under this act to maximum extent permitted by the terms of this act

(B) the term substantially limits shall be interpreted consistently with the findings and purposes of the ADA Amendments Act of 2008

(C) an impairment that substantially limits one major life activity need not limit other life activities in order to be considered a disability

(D) an impairment that is episodic or in remission is a disability if it would substantially limit a major life activity when active

(E) (i) the determination of whether an impairment substantially limits a major life activity shall be made without regard to the ameliorative effects of mitigating measures such as

(I) medication medical supplies equipment or appliances low vision devices (which do not include ordinary eyeglasses or contact lenses) prosthetics including limbs and devices hearing aids and cochlear implants or other implantable hearing devices mobility devices or oxygen therapy equipment and supplies;



- (II) use of assistive technology;
- (III) reasonable accommodations or auxiliary aids or services; ;or
- (IV) learned behavioral or adaptive neurological modifications

(ii) the ameliorative effects of the mitigating measures of ordinary eyeglasses or contact lenses shall be considered in determining whether an impairment substantially limits a major life activity

(iii) as used in this paragraph

(I) the term ordinary eyeglasses or contact lenses means lenses that are intended to fully correct vision acuity or eliminate refractive error; and

(II) the term low vision devices means devices that magnify enhance or otherwise augment a vision image permanent or long term 29 C.F.R. § 1630.2(j)(2)(ii)-(iii)

60 Plaintiff raised post traumatic stress disorder (PTSD) substantially limited her learning which was major life activity under statute where plaintiff testified about memory retention problems from (PTSD) panic attacks depression and feelings of discomfort or anxiety when proctors walked behind her in exam room Forbes v. St. Thomas Univ. Inc. 766 F. Supp. 2d 1222, 2010 U.S. Dist. Lexis 143160 (S.D. Fla. 2010) dismissed; and Shaffer v. Spherion Corp. 20 Am. Disabilities Cas. (BNA) 30, 2007 U.S. Dist. Lexis 93362 (D. Colo. Dec. 20, 2007)

61 First Amendment retaliation requires a showing of retaliatory animus. That animus can be found by a jury when deliberating on an Eight Amendment claim. A showing of retaliatory animus will lead directly to punitive awards.

62 Therefore Plaintiffs will depose Medical Records Supervisor Kathy Pullford who will testify as to the Authentication of The Medical Records and the Policy and Procedures which were in place as it relates to all medical policies and protocols (Exhibit A Subpoenas)

63 Plaintiff Frasier Sr. et al. prison number 379628 #s will depose all Defendants: Tim Schabring, Kimberly Napier, and Noah Nagy (Exhibit B Subpoenas)

64 Plaintiffs may depose Defendants: Cotton (JCF) Prison Chaplain J. Thompson, Food Service State of Michigan Manager Kevin Weissenborn, Director of Food Service Mr. Unknown Meyers (ADF), Cotton (JCF) Temp Side Prison Food Service employees Mr. Unknown Mannor (FS 5) and officers working (JCF) Correctional Facility food service Mr. Unknown Biggs and Mr. Unknown Graff as of October 2, 2023, Ms. Unknown Wright, Mr. Unknown Roda, Ms. Coffelt, and Food Service building regular officer Mr. Unknown Fields et al. John Does and Jane Does (Exhibit C Subpoenas)

65 Some Plaintiffs may depose Mental Health Case Managers Dr. Ms. A. Jones, Mr. K. Francies et al. to testify that to the authentication of Mental Health Records and the Policies and Procedures which were in place and comments and conclusions on progress notes for most all class members to this action whose listed as parties (Exhibit D)



DOCUMENTS

66 Plaintiffs must subpoena the Prison Temp Side Unit Log Books for 2019 through 2023 (Exhibit E)

Emails

67 Plaintiff Frazier Sr is going home soon and must subpoena email to or from or including Defendants: SGT Unknown Johnson LI Gowdy and Hearings Investigator Ms Unknown Austin in reference to Plaintiffs (Exhibit F )

68 Plaintiffs suffered and continues to suffer Plaintiff has been in debilitating pain for years Plaintiffs went years without proper medical care Plaintiff was fraudulently placed on suicide watch designation Plaintiff lost approximately 30 pounds Plaintiff was prior stabbed in Western District (URF) prison leaving him with life time scars and injuries Plaintiff now have mental and emotional communication that limits ranges of motion in his head right arm right shoulder left hand Plaintiff has limited strength in his right arm, left hand Plaintiff has problems in large crowds Plaintiff Prisoner Frazier Sr et al has suffered life long physical and psychological injuries

SETTLEMENTS

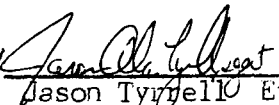
69. Plaintiffs is asking to compromise and settle this case for ranges of \$15 000 00 to \$30 000 00 individually or severally Plaintiffs is amenable to global settlements of any and all claims Interestingly all Class Members ask that they be allowed to communicate with those who are released transferred to other prisons and those who soon be released concerning this class action matter or appoint counsels

70 Because the Department of Corrections employees testimonies in Prisoners Class Action Members medical files mental health records and (JCF) Temp-Side Prison Pool Burn Style Housing Units Log Books provided sufficient evidence to make minimal showing necessary to survive summary judgment on some of their claims of substantial impairment in major life activities of sleeping interacting with others thinking reading and feeling safe from flashbacks of seeing other Prisoners killed stabbed due to MDOC S Prisons under staffed or officials not alert because falling asleep on their jobs from being overworked some district courts improperly granted partial summary judgment prior for employer and was instructed on a remand to determine merits of claims based on disability and record of disability

RELIEF SOUGHT

71 We the above Plaintiffs are seeking recoupment of damages brought upon their persons in the form of but not limited to physical mental psychological and emotional trauma These have been extensively expressed in the above brief and are not exhaustive We the Plaintiffs are asking for the sum of (\$500 000 00) five hundred thousand U S dollars per person and the continued mental health and medical services required to coexist and habitat in the communities each person will be integrating into We the Plaintiffs request the courts to show mercy and justice in this matter and GRANT this class action in its entirety

October 3 2023

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Jason Tyrrell Et al  
Pro Se (JCF) Prisoners

ATTACHMENT #

I, Jason Alan of the Family Tyrrell, am under Article 1 of the 14th Amendment of the Constitution of the United States of America a preamble private citizen, also known as a state national.

I have been incarcerated for the last 10 plus years with the Michigan Department of Corrections. During this time I have been exposed to unsafe living conditions and hazardous toxic environments. Some of these are black mold, asbestos, and other such materials. I have sleep apnea, this has caused me to use a C-PAP machine for breathing at night. There are times when I cannot use the machine due to power outages, extreme heat, or not being allowed to have it at certain times. The living conditions have been dismal and depressing. It has at times caused me to experience extreme depression and mental strife. During my time incarcerated I have seen and experienced staff members, target, harass, and cause unsafe conditions within the facility and housing units. Their conduct is unbecoming of an officer or any staff member. The displays of hate, jealousy, contempt, sadistic joy of causing pain, and racism is just a few of the things that still haunt me.

My time specifically at G. Robert Cotton Correctional Facility is the most recent place I have been housed. It is also the worst I have been in. The facility is housing me in a condemned portion of the prison known as the TEMP SIDE. It has polebarn housing units that are WAY past their useby dates. According to the MDOC website, this side of the facility is condemned, but they still house me there. If you were to look on OTIS or MDOC's offender location site, it shows that I am currently housed in the Cotton facility, NOT TEMP SIDE. We currently went through a boil water advisory from the county of Jackson, and the facility did not notify the prisoners in a timely manner, nor supply water to drink until a few days later.

That is just some of the issues currently being faced. NO ONE should be exposed to these conditions or living in such unsafe environments.

15/ Jason Alan Tyrrell, Agent

PRO SE Prisoner Michael Cook  
838504  
TF 30

CO/Mr. Patrice has made numerous sexual remarks towards me on many different occasions and times. He has been nothing but creating me a hostile and mental environment and I want this CO removed because my PTSD Psychological mental health condition is at an all time high because of Cotton JCF Prison regular TF Unit Correctional officer Mr. Patrice.

Due to my living condition my health is bad my asthma is not good due to dust, mold, and unsanitary condition of my housing unit. The unit is not clean like it should be.

Due to my hearing condition staff and the ADA are not doing what there are not following the guidelines of the hard of hearing condition and because of it I have missed meals and call-outs.

My mental health is not good due to the environment I am in and I feel like this is a big deal because I am not getting treated right. I would like whatever I can get and all counts within this case.

Mike Cook

Michigan Department of Corrections  
FIRST STEP GRIEVANCE RECEIPT

DATE: 9/13/2023

TO: WELLMAN 291585

LOCATION: JCF TF-69

FROM: Grievance Coordinator: Cobb

SUBJECT: Receipt for Step I Grievance

Grievance Identifier: JCF / 2023 / 09 / 1601 / 28C

Issue: MULTIPLE ISSUES

Received: 9/13/2023

Date Due: 10/4/2023

Your Step I grievance was received as indicated above. You should receive a response no later than the due date listed above. If you have not received a response by this date and no extension has been given, you may submit a written request for an appeal form to this office. You will need to note, on your request, the grievance identifier as listed above.

This guy was moved due to going insane  
from drug use as was unavailable to not used for  
him when any smoke was smelled by him.  
Fact is, this will hurt me for life  
Jason Tyrrell & Alvin Frazier, Sr.  
Mr. Wellman told me to list him after  
being encourage to express his problem to his case  
manager and Phase II instructor.

LS Alvin Frazier

I am Filing this grievance due to ~~un~~ ~~cur~~ ~~un~~ fair and very unsafe unhumane living condition! I was sent to prison for being under the influence of Meth ~~and~~ ~~heroin~~ and walking into the wrong house thinking I was being followed and that I was at a Buddys home! After 20 years and Two prior prison terms! For Mary and walk away from County jail! And keeping Meth out of my life after being introduced to it in high school! So it

So it is killing me mentally and Phil that a mistake and Relapsing of a few months prior to my arrest and return to prison costing me 8 years to 40 years! That I am forced to live 24/7 in a environment of Drug infested Drunkin Dorm Room with almost 200 people with over 50% of them using some kind of drug Meth heroin, weed, K2, and Yes SubXion which is now after years of complete failure on the MDOC to stop the uncheck unstopped Suplie and Million dollar quarterly at the exspearance to are loved ones! Its giving Free SubXion at a rate 100's times the average addict tolerance levels.

Due to Staff Shortage and the complete Desire of over 75% of Staff working across the state lack of Programming



waiting list, and staff that sit back and watch you watch drugs being used past Fist Fights, Stabing, extortion and complete "concern or ability from the ageing out of shap staff it has created unsafe ~~un~~health envirmment for me to not only get help to stay clean from Drug use! For many reason

1 haveing to Breath smoke Filled air From many differnt Drug being Smoked into my One Remaining lung!

2 No place to go to get away From the drug use and the dealer pushing it in a person face 24/7!

3 And Worst of all a untrained <sup>staff</sup> that dont care to do anything about the drug us, or the ones that do have no idea on what to look for in there cell or cube serches!

I am asking for clean drug free units be offered on each compound or facilities bechange there screening polices so a person with a desire to stay clean and can pass monthly drug screen and attend group meeting and offered classes to help addition can live so we as adict have a chance to stay clean in a safe Drug free environment!

Eddie Blackmore

#546481

1 of 2

2, 3, 4, 5, 6, 8, 12, 18, 20, 22, 23,

Statement of Facts

1. It's been hard for me to breathe due to all the dust in the air, and fans and potters to dust areas positions as their details states are never done regularly.

2. I have Sleep A disorder that make it hard for me to breathe when lay down and things not properly being clean makes my condition deteriorate at times that has caused me now to <sup>need a</sup> pap machine when trying to fall asleep I have to use every night per doctors orders. Strokes are to be expected without my blood pressure medications. My last blood pressure was 209 over 149, after missing of my medications.

3. My breathing second hand smoke in of synthetic drugs I been told ~~on~~ heard ~~my~~ <sup>when</sup> EMS comes into facility to pick up some prisoners whose tripping on them make me feel at times high myself. These prisoners jump off their top bunks onto floors as if they jumping into a swimming pool head first the sick doors open causing alarms to go off causing me to be alert. Interestingly, EMS always seems to arrive at the same conclusion of the problem that prisoners was either tripping off drugs or overdosed all the time.

4. The bathrooms are never clean and it's a lack of potters to clean, ~~that~~ prison officers derelictions of duties are always seen not enforcing potters to do their jobs.

5. My blood pressure been running high and (JCF)

Health care providers don't always give me my high blood pressure medication at times for 3 to five days at a time. Fact is, the doctor MS. <sup>unknown</sup> Jane Doe told me the reason for my meds being late is that they had to be renewed and medical staff had forgot to order my medications for my serious medical needs.

6. Cotton (JCF) Medical providers have changed my medication three to four times, and when I ask why they change my medication nurses tell me they don't know. Furthermore, the medical providers runs out my medication and when I ask them sometimes they tell me they don't know too. Lately, my blood pressure has been 159 over 199 which is still high.

7. I wrote a kite to talk with someone and after ~~one~~<sup>15</sup> days approximately the medical providers ~~to~~ responded back to me telling <sup>me</sup> watch out ~~for my health~~ <sup>to talk to nurses</sup>. However, I did not receive a response for my serious medical Request<sup>to</sup> to make an appointment to find out about the medication I'm taking and if I'm taking all the medications that I should be taking. (see ~~the~~ response as an offer of proof) ← (Taken by:)

initiated date: 10/18/2022 and for Sirena [SLI] RN,  
Received 11/02/2022

**Michigan Department of Corrections****Kite Response**

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**Offender #:** 0546481      **Offender Name:** BLACKAMORE, EDDIE JAMES**Location:** JCF - G. ROBERT COTTON CORRECTIONAL**Lock:** TA:138:Bot:U

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**Discipline:** Medical**Received Date:** 11/02/2022**Initiated Date:** 10/18/2022**Taken By:** Landfair, Sirena [SL1] RN**Request Type:** Medical Question**Request Summary:** I need to make a appointment to find out about the medication I'm taking and if I'm taking all the medications that I should be taking**Plan/Action:** Watch call out to talk to nurse**Comments:**

## PLAINTIFFS / IN PRO PER

ANTHONY THOMAS 348752  
 STEVEN SANCHEZ 514882  
 JOHN ROSS 324129  
 DARTAGNAN TURNER 593892  
 BOY GUY 244403  
 FRED MUSCAVITCH 710749  
 BRIAN OREILLY 652311  
 WILLIAM BURRELL 169106  
 MILLER FRANK 426793  
 BRYANT ANGEL 7200860  
 JOHN SUAREZ 570560  
 TERRY NEAL 330118  
 MICHAEL DIGGS 369628  
 KEITH ADAMS 366302  
 ALEX PRINCE 599306  
 TRAVIS MEAD 312873  
 DAVID DAVIS 433609  
 DEANDRE BURTON 654317  
 AARON WOODY 622275  
 CHUCK MILLS 728445  
 KYLE BISON 685233  
 JUAN MARTINEZ 884042  
 BRIAN LINDSEY 954908  
 ALFRED MCKNIGHT 653121  
 TIM BOWERS 728085  
 DON CANTRELL 207202  
 SAM HOUSE 654304  
 DEQUAD CROSBY 592868  
 JUSTIN MONTGOMERY 845875  
 ANTOINE STEWART 211050  
 SHAIN STEWART 856734  
 TIM GROOM 298867  
 MATT BURTON 284194  
 DUSTIN VANDYKEN 578493  
 MICHAEL HENRY 357330  
 ANTHONY DAVIS 571276  
 BRENT CAMERON 601722  
 MORRISON WALTER 970035  
 CLEATIS PETERSON 390944  
 ROBERT LYNCH 631928  
 MICHAEL SANDY 446945  
 IPRAHEM AL FADHIH 716244  
 TERRAN ABRAHAM 680695  
 CASEY BALSER 668261  
 TIMOTHY SNYDER 684408  
 JOSHUA SCHIMKE 954229  
 JOSEPH DYNICIL 611964  
 JOSEPH MORALES 148164  
 EZEKIEL RODRIGUEZ 710107  
 JASON BUCKLIN 616492  
 DONALD DRISKELL 188048  
 TIMHOUSER 396107  
 DE SHON THOMAS 256960  
 AARON SCHREINER 284661  
 ERIC STEWARD 738976

## Verification Statement

We, Alvin Duane Frazier, Sr. et al,  
 declare, swear, certify, and verify that  
 all the statements made in this action  
 on Class members behalf, our behalf are  
 true, correct, to our knowledge, understanding  
 and beliefs and is not used to mislead  
 the Courts. we all state under  
 penalty of perjury and (28 U.S.C. §  
 1746).

Alvin Duane Frazier, Sr. et al.

Michaela Carr

Janet L. Frazier



RAYNOLDS 872051  
ZACHAREY WILLIAMS 867884  
ELTON THOMAS 358583  
BARBER 614386  
WALLACE 242753  
COOK 235409  
KARAS 449862  
MCDOWELL 221159  
SHIVELY 187606  
STINNER 870552  
A SCHAFFER 804338  
KEELER 675358  
HIMEBAUGH 666451  
D MCLEOD 453396  
SEARS 665615  
GILDNER 661907  
HILL 474617  
LAWRENCE 636183  
GILLESPIE 582879  
SCHLOTTERBACK 414380  
MENGEL 273979  
BOBBY BOWERS 640409  
SPENCER 847193  
ARNSMAN 525832  
STINES 946233  
ROBINSON 765993  
WILLIAMS 654449  
RASHAD 265200  
STEVEN COLWELL 859049  
SCOTT M HENNING 795745  
ASTAVIAN D MCMILLIAN 534855  
COY BROWN 415544  
HOUSER JOSHUA 606955  
WAYNE SPENS 115583  
GARY A LANG 524628  
DEANGELO L AUBREY 316838  
JASON A RUSS 415833  
TEJUAN ANDERSON 513334  
JIMMY CONNER-FL 339962  
VALKEMA 456914  
GOULD 436735  
WRIGHT 687862  
WILSON 667622  
AYERS 958668  
BALOG 832672  
KEELER 675358  
SELBY 607095  
EARICK 681676  
SMITH 410825  
DALONJA CRUM 948978  
RALPH DWYER 401631  
SCOTT BUTLER 195743  
JOSH HOLTON 660310  
CRESTON HICKS 708027  
MICHAEL GRUMBLEY 872676  
NILE SCOTT HAMP 715604

ANTHONY TAYLOR 200520  
JASON BEDFORD 615939  
ANTHONY DOZE 424034  
HENDERSON GARRIS 243140  
MIGUEL OCHOA 641326  
DAVID ARRINGTON 180575  
COREY UNDERWOOD 465786  
JOSHUA HOLTON 660310  
CRESTON HICKS 708027  
EDDIE BLACKMORE 543481  
RALPH DWYER 401631  
MICHAEL GRUMBLEY 872676  
SCOTT BUTLER 195743  
DALONJA CRUM 948978  
JOSE GARCIA 225928  
NOAH DIBBLE 252401  
DESEAN MOORE 317080  
JASON ALAN TYRRELL 858081  
CHRIS HAZEN 590985  
JAMES NEAL 212071  
ISAIAH HARRIS 415670  
MICHAEL COOK 836504

Defendants/Witnesses List:

See Next Page 1 of 1

Next Page

NOAH NAGY FORMER HEAD JCF WARDEN Present Parnall (SMT) Prison Warden;  
Timothy Schubring "JCF" Business Manager;  
J JARRETT DEPUTY WARDEN  
T KISOR FORMER ASSISTANT DEPUTY WARDEN  
J WHITE FORMER ASSISTANT DEPUTY WARDEN Present FBI Employee;  
UNKNOWN PATRICE "JCF" CORRECTIONAL OFFICER;  
DR ALICE JONES JCF PRISONERS MENTAL HEALTH CASE MANAGER-TEAM MEMBER;  
DR UNKNOWN FRACIES CHIEF JCF PSYCHOLOGIST;  
WILLIAM HOGANSON JCF FOOD SERVICE CORRECTIONAL OFFICER;  
UNKNOWN ULCH JCF PUM;  
UNKNOWN JANE DOES AND JOHN DOES OF JCF EMPLOYED CONTRACTED MEDICAL STAFF MEMBERS;  
MS. UNKNOWN WOODS ET AL FORMER SCHOOL PRINCIPAL  
H ELUM NEENDONISS WOODWARD ET AL LAW LIBRARIAN TECHNICIAN/LEGAL COPIES;  
J THOMPSON "JCF" Religious Service Chaplain;  
J SCHLEY JCF Initial Classification;  
M HILL ET AL Special Activities/Persons With Disability Act;  
T COBBS ET AL JCF Grievance Coordinator;  
T GORDON ET AL Warden GCA (Restrictions Reinstate Approvals Denials);  
C McCUMBER-HEMRY ET AL Formal JCF Liaison;  
J COOLEY JCF MICHIGAN VIOLENCE PREVENTION "MIDVP" Facilitator;  
Unknown Vacant JCF Library Technician;  
Adrian Dirschell Special Activities Coordinator;  
JARED WARNER OFFICE OF LEGAL AFFAIRS:  
ANDY PHELPS POLICY QUESTIONS;  
KRISTIN VANHAFTEN. LITIGATION QUESTIONS A/LITIGATION MANAGER;  
ADRIAN DIRSCHELL. LEGAL WRITERS OFFICE: (517) 490-9597;  
TERESE PALETIA "JCF" LAW LIBRARY (CONTACT PERSON) LW-LAW FIRM: 816-957-5340;  
NORMA KILLOUGH JCF UCC/RESTRICTED PUBLICATIONS LIST: 517-373-0287;  
BRIDGID MURPHY TURNER - LIBRAIAN turnerb9@michigan.gov;  
Also MICHIGAN LIBRARY ASSOCIATION (MLA). www.milibraries.org;  
MARY KALAT FORMAL JCF LIBRARY TECHNICIAN/PRESENT PARNALL LIBRARY TECHNICIAN;  
BRANDON WADDELL ASSISTANT ATTORNEY GENERAL AG LITIGATION QUESTIONS 517-335-1414

ALL ABOVE LISTED DEFENDANTS ARE USED TO HAVE PRISONERS LITIGATION CLAIMS DISMISSED:

IF THE STATE OF MICHIGAN DEPARTMENT OF CORRECTIONS IS NOT HELD ACCOUNTABLE  
THESE ACTIONS WILL CONTINUE

Additional:

## PLAINTIFFS IN PRO PER Page 1 of

PRINT	Signatures	Prisoner	Signatures	Prisoner
NAME:		Number	NAME:	Number
aim # 1.	Anthony Taylor ✓	# 260528	Claim # 28.	#
aim # 2.	Anthony Dore ✓	# 424054	Claim # 29.	#
aim # 3.	Jason Bedford ✓	# 615939	Claim # 30.	#
aim # 4.	Henderson Garris ✓	# 243140	Claim # 31.	#
aim # 5.	Miguel Ochoa	# 641326	Claim # 32.	#
aim # 6.	David Arington	# 188575	Claim # 33.	#
aim # 7.	Corey Underwood	# 465786	Claim # 34.	#
aim # 8.	Joshua Holton	# 660310	Claim # 35.	#
aim # 9.	Creston Hicks	# 708027	Claim # 36.	#
aim # 10.	Eddie Blackmore	# 546481	Claim # 37.	#
aim # 11.	Ralph Dwyer	# 401631	Claim # 38.	#
aim # 12.	Michael Grumley	# 872676	Claim # 39.	#
aim # 13.	Scott Butler Sgt A. Butler	# 195743	Claim # 40.	#
aim # 14.	Nile Scott Hams	# 715604	Claim # 41.	#
aim # 15.	Dalonia Crum	# 948978	Claim # 42.	#
aim # 16.	Jose Garcia	# 225928	Claim # 43.	#
aim # All 17.	Noah Dibble	# 252401	Claim # 44.	#
aim # All 18.	DeSean Moore	# 317086	Claim # 45.	#
aim # 19.	Chris Hagen	# 858081	Claim # 46.	#
aim # 20.	James Neal	# 590983	Claim # 47.	#
aim # 21.	Elsworth Harris	# 212071	Claim # 48.	#
aim # 22.	Michael Cook	# 415670	Claim # 49.	#
aim # 23.	Dean Grice	# 838504	Claim # 50.	#
aim # 24.		# 274887	Claim # 51.	#
aim # 25.		#	Claim # 52.	#
aim # 26.		#	Claim # 53.	#
aim # 27.		#	Claim # 54.	#



## PLAINTIFFS IN PRO PER P. 2 of

PRINT NAME:	Prisoner Number	Signature	Prisoner Number
55. Anthony Thomas	348752	82. <del>Anthony Thomas</del> Kyle Burton	685233
56. Steven Sanchez	514882	83. Martinez, Juan	884042
57. John Ross	324129	84. Lindsey, Brian	954908
58. <del>John Ross</del>	324129	85. Jim Weller	753291
59. <del>Darryl Woods</del>	479428	86. <del>Alfred McKnight</del>	653121
60. Dartagnan Turner	593892	87. Tim Bowers	928085
61. Boy Guy	244403	88. Don Cantrell	207202
62. Antonio Jennings	262182	89. <del>Gregg</del>	706022
63. Fred Muscaritch	710749	90. Sam House	654304
64. Brian O'Reilly	68231	91. <del>Dean All Proctor</del>	542868
65. William Rurrell	169106	92. Justin Montgomery	845675
66. Miller Frank	426793	93. Antonio Stewart	211050
67. Bryant Angel	720880	94. Cameron VanDerBerg	975010
68. John Suarez	590560	95. <del>Brent Van Der Berg</del>	891970
69. Terry Neal	339118	96. <del>Brent Van Der Berg</del>	492685
70. Michael Diggins	369628	97. <del>Brent Van Der Berg</del>	856734
71. Keith Adams	366302	98. <del>Brent Van Der Berg</del>	346088
72. <del>Carl Roberts</del>	522794	99. <del>Brent Van Der Berg</del>	298867
73. <del>Max Privet</del>	599306	100. Matt Burton	284194
74. <del>FA Travis Mc</del>	312873	101. <del>Brent Van Der Berg</del>	678493
75. <del>Buteha</del>	515509	102. Michael Henry	357330
76. <del>David Davis</del>	433609	103. Anthony Davis	571276
77. DeAndre Burton	654317	104. Brent Cameron	601722
78. Aaron Wood	622215	105. Morrison Watter	970035
79. Martney	220525	106. <del>Darin Galbraith</del>	160785
80. <del>Griffin</del>	421950	107. <del>Clark Peterson</del>	390941
81. <del>Churp</del>	937924	108. <del>Robert Lupton</del>	631928
82. Chuck Miles	728445		

## PLAINTIFFS IN PRO PER

PRINT NAME:	Signature	NAME:	Signature
119. Michael Sardy	446945	Richard Schmidt	685008
120. Ibrahim Al-Fachry	716248	Arren Schreiner	284661
121. Terrin Abraham	680695	Felix Steward	738976
122. Casey Salser	668261	Reynolds	872051
123. Timothy S. S.	684408	Fachry Rahman	867884
124. Joshua D. Schmitke	964229		
125. Joseph Duncil	611964		
126. Joseph Morales	148164		
127. Donald Galtner	584568		
128. Buddy Bannum	623637		
129. [Signature]	508609		
130. [Signature]	816242		
131. Joree Martin	773349		
132. [Signature]	694444		
133. Dennis E. Datt	945521		
134. [Signature]	486646		
135. Paul Sharp	682297		
136. Ezekiel Rodriguez	710107		
137. [Signature]	787137		
138. JASON BUKLIN	616492		
139. Donald Driskell	188048		
140. Tim Houser	396107		
141. Keontae Geter	590524		
142. DE'SHON THOMAS	256960		
143. Galtel	885760		
144. [Signature]	644878		
145. [Signature]	194496		

# GRUNDS FOR ACTION CASE #

WHEN MDOC ACTIONS  
ARE NOT HELD ACCOUNTABLE  
THEN PRISONERS SUFFER  
FROM MDOC IN LACK OF  
POLICY. OR weights  
and MEASURES Imposed By (Covid)  
Covid-19 and MANY OTHER stipulations.

OR ALL GRUNDS (Names and Numbers FROM TE UNIT

LIST # THRU. 35 GRUNDS	PRINT Name <del>TE UNIT</del> LAST	PRISON NUMBER	WHERE YOU LOCK
211 Grunds	Elton Thomas	358583	TE-13
ALL GRUNDS	BARBER	614386	TE-94
	WALLACE	242753	TE-015
	Cook	235409	TE-9
	Karas	449662	TE 150
	• Hefthaler	858375	TE 24
	McDowell	228559	TE 82
	Shipely	162606	TE-132
	Stimmer	870552	TE-148
111 Grunds	A. Schafer	804338	TE-90
111 Grunds	C. Keele	675358	TE-93
	S. HIMEBAUGH	666450	TE 57
	D. McLeod	453396	TE-100
	• McCain	531312	TE 97
	• Hingford	517588	TE-98
	Sears	665615	TE-99
	GILDER	681907	TE-155
	LI: 11	474117	TE-101

OR ALL

TE UNIT

LIST GROUNDS 1 THRU 35	PRINT NAME LAST	PRISON NUMBER	WHERE YOU LOCK
All Grounds	Lawrence	636 183	TE-114
"	GILLESPIE	782879	TE-126
"	Schlottback	414380	TE-146
"	London	539203	TE-151
"	Mengel	223979	TE-152
"	#2. Stonehouse	633478	TE-26
"	Bobby Bowers	640409	TE 133
"	SPENCER	847193	TE 136
"	Arnsman	525832	TE 124
"	Largis	117306	TE 130
"	STINES	946233	TE 115
"	Robinson	765993	TE 109
"	Williams	654449	TE 39 10.4.28
"	RASHAD	265200	TE-16
* caught covid 3 Times	Steven Colwell	859049	TE-54
	Scott M. Henning	795745	TE-53
	Astorian D McMillan	534855	TE-69
	Coy Brown	415544	TE-70
	Houser Joshua	606955	TE-36
" " 25+ days in TE 26 days had covid 3-Times	Spens, Wayne	115583	TE-31
"	Kemmerlin, Zachary	637071	TE-41
"	Gary A. Lang	524628	TE 34
	DeAngelo L. Aubrey	316838 11/10/2022	TE 30
	Jason A. Russ	415833 4/10/22	TE-22
	Tesuan Anderson	513334	TE-27
	Jimmy Conner EL	339962	TE-21







Paragraphs: Grounds for Action

Case No. \_\_\_\_\_

Hon. \_\_\_\_\_

Mag. \_\_\_\_\_

PLAINTIFFS CLAIMS:See Paragraphs of Claims Grounds for Action.1. I, Anthony Taylor / inmate number 260528 / ClaimsChose paragraphs # 8 11 15 17 18 22 23 25 26 32;2. I, Jason Bedford / inmate number 615939 / ClaimsChose paragraphs # 1, 2, 3, 4, 5, 6, 8 thru 35;3. I, Anthony Doze / inmate number 424054 / ClaimsChose paragraphs # 3, 4, 5, 6, 8, 9, 11, 14, 16, 18, 22, 23, 24, 25, 26;4. I, Henderson Garri / inmate number 243140 / Claims

Chose paragraphs #s — —

5. I, \_\_\_\_\_ / inmate number \_\_\_\_\_ / Claims

Chose paragraphs #s — — / Claims

b. I, \_\_\_\_\_ / inmate number \_\_\_\_\_

Chose paragraphs #s — — / Claims

7. I, \_\_\_\_\_ / inmate number \_\_\_\_\_

Chose paragraphs #s — — / Claims

8. I, \_\_\_\_\_ / inmate number \_\_\_\_\_

Chose paragraphs #s — — / Claims

9. I, \_\_\_\_\_ / inmate number \_\_\_\_\_

Chose paragraphs #s — — / Claims

10. I, \_\_\_\_\_ / inmate number \_\_\_\_\_

Chose paragraphs #s — —

TA

1) Ralph Dwyer #401631

2/3/4/5/6/8/9/10/

15/18/19/20/21/22/23

24/25/26/28/

2) Scott Butler 195743

2/3/4/5/6/8/9/10/15/18/19/20/21

22/23/24/25/26/28

Bad Number

1) Phillip J MARSDEY 43429

(4) (5) (6) (8) (18) (20)

(22) (24)

2) Josh Holton 6120310

1) 3) 4) 6) 8) 10)  
15) 18) 22) 23) 27)  
31)

3) Creston Hicks #708027

3, 4, 8, 9, 18, 22, 23, 26, 32,

4) Michael Gumbley #872676

1) 2) 3) 4) 5) 6) 8) 15) 18) 22) 23) 24)  
26)

5) Nile Scott Hamp # 715604

1, 6, 5, 12, 13, 3, 10, 19, 18, 24, 25, 26, 28,

6)

Claim Number 5:

JOSE GARCIA

# 225928

11-6-22

#6

#8

#18

#20

#21

#22

#23

#25

#33

#35

#6 While COVID-19 was in its peak I was forced to sit inches from another prisoner while eating / if I wanted to eat.

#8 Duress of needing to eat w/out receiving a major ticket (see above).

#18 Inadequate cleaning supplies, being maid to live in dirty living conditions.

#21 Officers did not make porters clean restrooms at all / to wake up to numerous bars of soap, toilet paper on ledge. Clearly no supervisor (C.O.) cared, or acted upon.

#22 Every tray & Spork have been greasy after allegedly been washed.

#23 Air quality Filthy & only cleaned Exhaust ducts when prior notification was given of an inspection.

#25 Full trash cans full of filth. SEE #21.

#33 Fear to file grievance per retaliation, being maid to live in duress of a mysterious item pepping up in area of control.

#35 To have room shock down cause of a mistake one dose as retaliation by C.O.s tearing through others property & announcing it to others in cubicle places the individual in danger!

Datonja Crum #948978

Lock - TA-82

- 4/ Failure to protect prisoners from unreasonable risks
- 5/ FDA & CDC Measures of social distance, living spaces of prisoners being housed within MDOC.
- 6/ Exposures to Covid-19, or any other diseases
- 8/ Intentional infliction of Emotional Distress (place Covid-19 social distance signs but threatening us with DDO if we don't social distance in chow halls etc.)

How each # applies to me.

- 4- Since I have been housed at JCF TA-82 (A unit that was at that time considered a unit for close contacts when I have never tested positive for Covid- nor locked with anyone who has) they have been constantly moving people that have been close contacts around me.
- 5- We don't have enough room to social distance (ex. 18 people living in a 20 x 15 ft radius.) (Ex. 2 US sitting shoulder to shoulder at breakfast, lunch, and dinner in the chow hall)
6. CO's that work in the Covid-positive unit would work in the other units in the same day (ex. first shift. Second shift, third shift.) (Covid unit TF)
8. If we don't agree with any orders from staff (ex. sit shoulder to shoulder in the chow hall) we will get a ticket class 2 or possibly go to the hole. When we are only trying to protect ourselves and each other by giving each other space. Also the unprofessionalism in the way staff speak to us prisoners. In a disrespectful manner. cursing etc....



615939 Bedford-1 2 3 4 5 6 8 9 10 11 12 13 14  
15 16 17 18 19 20 21 22 23 24 25 26 27 28  
29 30 31 32 33 34 35

424054 Doze 3 4 5 6 8 9 11 14 16 18 22 23 24  
25 26

JASON ALAN TYRRELL & Alvin Frazier Sr ET Al  
G Robert Cotton Correctional Facility (JCF)  
3510 North Elm Road  
Jackson MI 49201

RECEIVED  
JAN 25 2024

CLERK'S OFFICE  
U.S. DISTRICT COURT  
ANN ARBOR, MI

Clerk of the Court  
U S Eastern District Court  
200 E Liberty St Rm 300  
Ann Arbor MI 48101

Re: New Class Action Under Rule 23 (1) Et Seq

Dear Clerk:

Enclosed please find for filing an original marked Judges Copy and one copy of the following:

1) Class Members Rule 23(1) Et Seq Civil Rights Complaint

2) Verification Statement and

Proof of Service

3) Account Statements

Please notify the Class Members of any concerns with the filing of the Complaint and with the Case Number and Judge assigned the class action Thank you for our cooperation

Sincerely

October 3 2023

ISI Jason A Tyrrell  
Jason A Tyrrell et al P058081  
Class Members in pro per

cc: Defendant  
File

Alvin Frazier Sr

Alvin D. Frazier, 379628  
G. Robert Cotton, Jr., Esq.  
3510 North Elm Road  
Jackson, Michigan 49201

RECEIVED  
JAN 25 2024  
CLERK'S OFFICE  
U.S. DISTRICT COURT  
ANN ARBOR, MI



1/19/24

To: Clerk of the Court  
Eastern District of Michigan  
Judge Judith E. Levy  
200 East Liberty Street, RM 300  
Ann Arbor, Michigan, 48104

U.S. MARSHALS

Metroplex MI 480 ZIP  
WED 04 OCT 2023M